

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

DIBY AKO

PLAINTIFF

vs.

No. 3:22-cv-1751

**ARRIVA BEST SECURITY, INC.,
and AMOIFO KOFFI**

DEFENDANTS

DECLARATION OF ATTORNEY SEAN SHORT

Attorney Sean Short hereby states on oath as follows:

1. I am over the age of 18 and legally qualified to execute this Declaration.
2. I am an attorney licensed and in good standing in the State of Arkansas, as well as numerous United States District Courts. I practice law with the law firm of Sanford Law Firm, PLLC.
3. I am familiar with the facts of Plaintiff Diby Ako's lawsuit against Defendants Arriva Best Security, Inc., and Amoifo Koffi, and I have assisted the attorney of record in this case with various aspects of the litigation since its inception.
4. As of April 12, 2024, I know of no instances where either Defendant, or one of their representatives, has attempted to contact myself or Sanford Law Firm, PLLC.
5. On April 9, 2024, I used the TLOxp service to perform a skip trace for individuals named Amoifo Koffi which produced one result and provided me with a date of birth for that individual.
6. On April 9, 2024, I personally submitted a record request for Defendant Amoifo Koffi on the Servicemembers Civil Relief Act ("SCRA") Website,

<https://scra.dmdc.osd.mil/scra/#/single-record>, using the date of birth I received from the skip trace I performed and the Status Report that I received in response to my request from the Department of Defense Manpower Data Center confirmed that Defendant Amoifo Koffi is not an active duty servicemember of any branch of the United States Uniformed Services. A true and correct copy of the Status Report is attached hereto as Exhibit A.

Pursuant to 28 U.S.C. § 1746, I verify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: April 10, 2024

/s/ Sean Short
Sean Short



Status Report

Pursuant to Servicemembers Civil Relief Act

SSN:

Birth Date: Jan-XX-1963

Last Name: KOFFI

First Name: AMOIFO

Middle Name:

Status As Of: Apr-09-2024

Certificate ID: GVFMQVBQW0696Q8

On Active Duty On Active Duty Status Date			
Active Duty Start Date	Active Duty End Date	Status	Service Component
NA	NA	No	NA
This response reflects the individuals' active duty status based on the Active Duty Status Date			

Left Active Duty Within 367 Days of Active Duty Status Date			
Active Duty Start Date	Active Duty End Date	Status	Service Component
NA	NA	No	NA
This response reflects where the individual left active duty status within 367 days preceding the Active Duty Status Date			

The Member or His/Her Unit Was Notified of a Future Call-Up to Active Duty on Active Duty Status Date			
Order Notification Start Date	Order Notification End Date	Status	Service Component
NA	NA	No	NA
This response reflects whether the individual or his/her unit has received early notification to report for active duty			

Upon searching the data banks of the Department of Defense Manpower Data Center, based on the information that you provided, the above is the status of the individual on the active duty status date as to all branches of the Uniformed Services (Army, Navy, Marine Corps, Air Force, Space Force, NOAA, Public Health, and Coast Guard). This status includes information on a Servicemember or his/her unit receiving notification of future orders to report for Active Duty. HOWEVER, WITHOUT A SOCIAL SECURITY NUMBER, THE DEPARTMENT OF DEFENSE MANPOWER DATA CENTER CANNOT AUTHORITATIVELY ASSERT THAT THIS IS THE SAME INDIVIDUAL THAT YOUR QUERY REFERS TO. NAME AND DATE OF BIRTH ALONE DO NOT UNIQUELY IDENTIFY AN INDIVIDUAL.

Sam Yousefzadeh

Sam Yousefzadeh, Director
Department of Defense - Manpower Data Center
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